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VIA AIRBORNE EXPRESS



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650 Liberty Ave.
Union, NJ 07083-8107
201 851-2200

June 3, 1988

Mr. William Steuteville
U.S. Environmental Protection Agency
841 Chestnut Building
Philadelphia, PA 19107

RE: Removal of Cable Casings from C&D Recycling Site

Dear Bill:

Thank you for your letter dated April 18, 1988, pertaining to EPA's review of the Work Plan for Cable Casing Pile Removal at the C&D Recycling Site. The issues discussed in your letter are addressed below:

Fate and transport of the cable casings

Mr. Joseph Brennar, the owner of the C&D Recycling Site, has arranged for the sale of the cable casings to Kaiser International, a firm specializing in the export of plastic and paper materials and having a principal place of business at One World Trade Center, Suite 7967, New York, NY 10048. Kaiser International will resell the cable casings to Royal Pacific Trading Pte. Ltd. Royal Pacific is an importer and exporter of plastics and chemicals and is located at 1 Colombo Court, #08-15, Singapore 0617. Royal Pacific will hire a processing firm in Singapore to process the cable casings into reusable materials.

AT&T Nassau Metals Corporation (Nassau) will pay for the loading of the cable casings into trailers at the C&D Recycling Site and the transport of the casings by licensed carrier to Zozzaro Brothers Recycling Center in Clifton, New Jersey. It is anticipated that from four to seven trailer loads of casings will be transported from the C&D Recycling Site to the Zozzaro Brothers facility each weekday. Kaiser International will pay for the baling of the casings at Zozzaro Brothers. The casings need to be baled for loading into overseas containers.

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I have inspected the Zozzaro Brothers facility and found the housekeeping at this indoor facility to be very good. I am enclosing correspondence from me to the State of New Jersey Department of Environmental Protection (NJDEP) dated February 1, 1988, and May 3, 1988, and correspondence from NJDEP to me dated April 22, 1988 and May 17, 1988. The letters from NJDEP classify the cable casings as a non-hazardous industrial waste and confirm that the Division of Solid Waste Management does not have any problems with the use of the Zozzaro Brothers facility for baling the casings.

Kaiser International will have the overseas containers transported from Zozzaro Brothers to a New Jersey dock from which the containers will be shipped to Singapore. Travel time to Singapore is approximately 45 days.

By the time the containers arrive in Singapore, Royal Pacific will have contracted with a local firm to perform the processing of the casings. The bales will be loosened and where possible the metal and low density polyethylene plastic will be separated manually. Any metal encapsulated in the plastic will be removed by mechanically stripping the metal from the plastic.

The aluminum will be sent to a secondary smelter where it will be melted and made into aluminum cubes. These cubes will be used either in Singapore for molding articles or exported to India for similar use.

The steel will be sent to a smelter for melting and recovery.

The plastic will be washed with water, chopped to lengths of approximately two feet and in turn chopped into small bits. The small bits will be pelletized to pellets of uniform size. The pellets will be bagged and shipped to India. In India, the pellets will be used to make sewer pipes, garbage bags or used for insulation purposes.

Nassau will be provided with shipping documents tracing the shipment of the cable casings to Singapore. Nassau will also have one or more inspections performed of the processor in Singapore to ensure that the material is being processed as described above. USEPA will be provided with a copy of the inspection report. Kaiser International will spend considerable funds for the baling and shipment of the casings. This monetary commitment by Kaiser provides additional assurance that maximum utilization of this valuable resource will result.

The purchase of the cable casings by Kaiser is highly dependent on the value of plastic and metals. Since these commodity values fluctuate widely and rapidly, it is very important that the casings be removed and transported expeditiously.

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Lining of trailers with plastic

The use of a crane equipped with a clam shell for the loading of the cable casings should not result in any significant rain water entering the trailers. The trailers will be covered with tarpaulin after they are loaded. There should not be any spillage/leakage of water and debris enroute to the Zozzaro Brothers facility and the use of plastic for lining the trailer bottoms would result in the creation of a substantial amount of waste material. I discussed the loading procedures at the C&D Recycling site with Mr. Reno Ducceschi of PADER on May 23, 1988, and agreed to keep several sheets of plastic at the Site for use should the loading be performed during periods of rain. Also, both EPA and PADER are welcome to be at the Site during the initial loading operation to ensure that the material is being suitably loaded and transported.

Hydroseeding

The collection of soil samples at the Site will be performed prior to hydroseeding. Hydroseeding will not affect any sample results.

Consent Agreement


The amendment to the Administrative Order on Consent, Docket No. III-87-31-DC is attached. The amendment has already been signed by AT&T Nassau Metals Corporation.

PADER Approval

Mr. Ducceschi is being sent a copy of this letter along with the NJDEP correspondence. If the removal and transport procedures described in the Work Plan and this letter are to PADER's satisfaction, we request that written approval from PADER be provided.

Please contact me if you have any questions regarding this letter.

Sincerely,


Larry A. Elder
Senior Engineer

Enc.

Copy to: (w/enc.)
R. Ducceschi - PADER

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